

Rev'd by: bro

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

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THADDEUS MOORE

CASE No. SAG-24CV-361

PLAINTIFF

SUBBA REDDY

DEFENDANT

PLAINTIFFS ANSWER TO SHOW CAUSE ORDER

Now comes THADDEUS MOORE PRO SE PLAINTIFF in response to order issued by the Honorable Stephanie A Gallagher UNITED STATES DISTRICT JUDGE.

IN RESPONSE TO LETTER ORDER; PLAINTIFF HAS ADDED ASSISTANT STATES ATTORNEY CIARRA M. ROULHAC AS A DEFENDANT.

BACKGROUND: ASSISTANT STATES ATTORNEY CIARRA M. ROULHAC on 2 separate occasions has charged the plaintiff in this case Thaddeus Moore OWNER of 10069 Guilford Rd. Jessup Md. 20794 LOT 26 with CRIMINAL TRESPASSING for being on property that he legally owns.

PLAINTIFF THADDEUS MOORE purchased the property known as 10069 Guilford Rd. Jessup Maryland 20794 lot 26 of the Nordeau section of HOWARD COUNTY MARYLAND on March 22, 2006. Defendant SUBBA REDDY purchased the property known as 10071 Guilford Rd. Jessup Md. 20794 on March 31, 2017 as an investment property Mr. Reddy.

After being denied 3 times in HOWARD COUNTY CIRCUIT COURT and being warned by Plaintiff THADDEUS MOORES ATTORNEY at the time Attorney Thomas Kerns McKnight the property belonged to the plaintiff Thaddeus Moore thru his then Attorney Michael Moran Defendant ABUSED THE JUDICIAL PROCESS as noted then by the Plaintiffs attorney Thomas

McKnight. (SEE CASE No. C-13-CV-18-000012). Attorney McKnight eventually asked to be dismissed and was.

Defendant continued until he was eventually granted the plaintiffs property which is a bridge that traverses over a stream on lot 26 which is owned by the plaintiff which is essential to his company's operation as equipment is stored in the rear. The Declaratory Judgement OF OCTOBER 11, 2019 made it illegal for the plaintiff to be on property that defendant has no easement although he was offered one. This is a violation of the FOURTEENTH AMENDMENT RIGHTS SECTION 1.OF THE PLAINTIFF. THIS HAS BEEN ADDED TO THE CHARGES. ASSISTANT STATES ATTORNEY CIARRA ROULHAC not only unlawfully charged Thaddeus Moore with trespassing at the property he owns the first time, but after being warned that the matter had not been adjudicated in state court by then attorney of Thaddeus Moore Charles L. Fuller, despite this she proceeded to trial. (SEE EXHIBIT B).

Plaintiff Thaddeus Moore was found not guilty by the Honorable Judge Neil Axel (SEE EXHIBIT A) in CRIMINAL TRESPASSING CASE No. D-101-CR-20-001 290. (SEE EXHIBIT C).

ON JANUARY 27,2023 DEFENDANT THROUGH hired contract labor that routinely works for him at the residence began putting up a fence beyond the property that was unlawfully granted in the declaratory judgement and even further on to plaintiff's property fencing in his trucks and making it impossible to get his trucks out. Plaintiffs dog bit defendant on the hand. BEWARE OF DOG SIGNS ARE POSTED ON THE PROPERTY On February 1, 2023 the plaintiff was arrested by the Howard County police after pulling out of his driveway. Plaintiff was released the following morning at a bail review hearing by the Honorable Judge Mary Reese. Plaintiff was indicted again by Assistant States ON MAY 18,2023 A CONTEMPT HEARING WAS HELD AT THE REQUEST OF ASSITANT STATES ATTORNEY CIARRA ROULHAC. THE HONORABLE JUDGE MARY KRAMER DENIED THE MOTION STATING THE PROSECUTOR'S WITNESS DID NOT SHOW FOR THE HEARING NOR WAS THADDEUS MOORE THE DEFENDANT IN THAT CASE SERVED. (SEE EXHIBIT E).

ON MAY 31, 2023 AT A MOTIONS HEARING ASSISTANT STATES ATTORNEY CIARRA ROULHAC PROCEEDED WITH THE CONTEMPT HEARING REGARDLESS AND JAILED THADDEUS MOORE THE PLAINTIFF IN THIS CASE WITH NO BOND FOR 3 WEEKS. PLAINTIFF DID STATE HE WAS SEEKING COUNSEL IN COURT BUT HAD NOT RETAINED COUNSEL AS OF YET. NONETHELESS PLAINTIFF WAS JAILED FOR THE FIRST TIME IN HIS LIFE AT 60 YEARS OF AGE WITH NO BOND.

After Plaintiffs MOTHER PAID THE \$17,500 retainer fee to Attorney James Papermeister and after attorney Papermeister argued it was wrong to have jailed the plaintiff with NO BOND, Plaintiff was released from jail after Father's Day on June 21,2023 by The Honorable Judge McCrone.

ASSISTANT STATES ATTORNEY Prosecutor Roulhac was WELL AWARE THE PROPERTY BOUNDARIES WERE BEING CONTESTED FROM HER FIRST FAILED ATTEMPT TO PROSECUTE THE PLAINTIFF. Assistant States Attorney Ciarra Roulhac's actions were a blatant violation of Plaintiff's RIGHT TO DUE PROCEES THE FOURTEENTH AMENDMENDMENT SECTION 1.

AS WELL AS A VIOLATION OF PLAINTIFF'S EIGHTH AMENDMENT (NO BAIL) CRUEL AND UNUSUAL PUNISHMENT. WHICH PLAINTIFF IS ADDING TO THE CHARGES.

Plaintiff also points to ASSISTANT STATES ATTORNEY CIARRA ROULHAC'S MOTION IN LIMINE TO EXCLUDE EXPERT WITNESS GARY LANE AND ANY TESTIMONY OR EVIDENCE RELATED TO THE LAND SURVEY CONDUCTED BY GARY LANE.

MR. LANES SURVEY MATCHES THE COUNTY PLAT AND DEFENDANT HAS NO EASEMENT!

THIS IN CONJUNCTION WITH THE WRIT CERTIORARI SUBMITTED TO THE MARYLAND COURT OF APPEALS THAT WAS DENIED ON NOVEMBER 20,2020 (SEE EXHIBIT (J) PROVIDED. BY ATTORNEY DORIS WALKER GREEN.

THE PLAINTIFF OFFERS AS PROOF (AS WELL AS THE CHARGES THAT HAVE BEEN ADDED OF:

FOURTENTH AMENDMENT SECTION 1

EIGHTH AMENDMENT CRUEL AND UNUSUAL PUNISHMENT

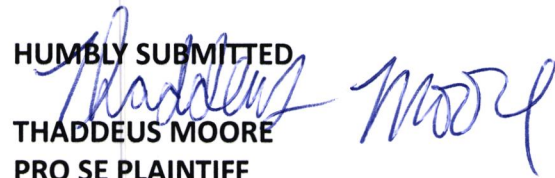
CONVERSION

IN ADDITION TO THE ORIGINAL CHARGE. PLAINTIFF IS SEEKING TO RETAIN COUNSEL AND IS HOPEFUL TO DO SO SHORTLY.

WHEREFORE HUMBLY PLAINTIFF ANSWERS THE SHOW CAUSE ORDER OF THE HONORABLE STEPHANIE A. GALLAGHER.

HUMBLY SUBMITTED

THADDEUS MOORE
PRO SE PLAINTIFF

A handwritten signature in blue ink, appearing to read "Thaddeus Moore", is written over the printed name and title of the plaintiff.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

THADDEUS MOORE

*

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v.

Case No. SAG-24-361

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SUBBA REDDY

*

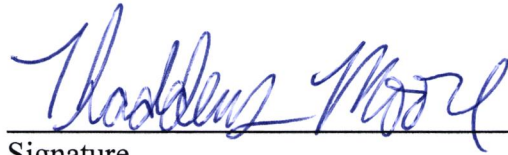
CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2024, a copy of RESPONSE TO SHOW
CAUSE ORDER

which was electronically filed in this case on _____, was mailed via
first class mail, postage prepaid, to Robert M. Gittins C/O DAVE MICHALSKI

April 22, 2024

Date



Signature

Thaddeus Moore Pro Se Plaintiff

Printed Name and Bar Number

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